

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

ENGINEERING AND COMPLIANCE OFFICE

**APPLICATION PROCESSING AND CALCULATIONS**

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Minor Title V/RECLAIM Permit Revision  
Changes of Conditions  
Changes of Description  
Spray Booths

Legal Owner

ID 2083

or Operator:

SUPERIOR INDUSTRIES INTERNATIONAL INC.  
7800 WOODLEY AVENUE  
VAN NUYS, CA 91406

Equipment

Location:

7800 WOODLEY AVENUE, VAN NUYS, CA 91406

**EQUIPMENT DESCRIPTION:**

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
<b>Process 2: ALUMINUM WHEEL COATING</b>					
SPRAY COATING OPERATION, NEUTRO PAINT SPRAY BOOTH, (16 W. X 21 L. X 7 H.) FT, WITH <del>FIFTY FOUR (20 W. X 25 L. X 2 T.) INCH EXHAUST FILTERS</del>	D64			[PM]: RULE 404,2-7-1986; <del>RULE 405,2-7-1986</del> [VOC]: RULE 1107,11-9-2001; <del>RULE 1107, 1-6-2006</del> ;RULE 1171,11-7-2003; <del>RULE 1171,5-6-2005</del> ;RULE 1171, 2-1-2008	A63.2, <del>B27.2</del> , <del>B59.9</del> , C6.6, D322.1, D323.2, <del>E80.1</del> , <del>E175.1</del> , <del>E175.2</del> , H23.1, K67.2
<u>FILTER, 1ST STAGE, THREE 2-PLY SYNTHETIC-FIBER PANELS, ATI, ULTRA, EACH (84 H. X 66 W. X 1 T.) INCH.</u>	C136				
<u>FILTER, 2ND STAGE, TWENTY-SEVEN 3-PLY 2-POCKET SYNTHETIC-FIBER BAG FILTERS, FILTER SYSTEMS, P/N 045-202518/2P, EACH (20 H. X 25 W. X 18 D.) INCH.</u>	C137				
A/N <del>369234</del> <u>491097</u>					

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SPRAY COATING OPERATION, NORDSON, POWDER COATING TOTAL SPRAY ENCLOSURE NO. 1, (186 W. X 226 L. X 130 H.) INCH WITH  FILTER, TWELVE PRIMARY 36-INCH CARTRIDGES, FIVE SECONDARY BOX-TYPE 95%-D.O.P RATED FILTERS, NORDSON  A/N <del>369231</del> 488521	D65          C66			[PM]: RULE 404,2-7- 1986;RULE 405,2-7-1986 [VOC]: RULE 1107,11-9- 2001; <u>RULE 1107, 1-6- 2006</u> ,RULE 1171,11-7- 2003; <u>RULE 1171,5-6- 2005</u> , <u>RULE 1171, 2-1- 2008</u>	A63.2, B27.2, C1.3, <del>C6.6</del> , <u>C6.7</u> , <u>C6.8</u> , D322.1, D323.2, <del>E80.2</del> , <u>E175.3</u> , H23.1, K67.2
SPRAY COATING OPERATION, NORDSON, POWDER COATING TOTAL SPRAY ENCLOSURE NO. 2, (186 W. X 226 L. X 130 H.) INCH WITH  FILTER, TWELVE PRIMARY 36-INCH CARTRIDGES, FIVE SECONDARY BOX-TYPE 95%-D.O.P RATED FILTERS, NORDSON  A/N <del>369232</del> 488523	D67          C68			[PM]: RULE 404,2-7- 1986;RULE 405,2-7-1986 [VOC]: RULE 1107,11-9- 2001; <u>RULE 1107, 1-6- 2006</u> ,RULE 1171,11-7- 2003; <u>RULE 1171,5-6- 2005</u> , <u>RULE 1171, 2-1- 2008</u>	A63.2, B27.2, C1.11, <del>C6.6</del> , <u>C6.7</u> , <u>C6.8</u> , D322.1, D323.2, <del>E80.3</del> , <u>E175.3</u> , H23.1, K67.2
SPRAY COATING OPERATION, NORDSON, POWDER COATING TOTAL SPRAY ENCLOSURE NO. 3, (186 W. X 226 L. X 130 H.) INCH WITH  FILTER, TWELVE PRIMARY 36-INCH CARTRIDGES, FIVE SECONDARY BOX-TYPE 95%-D.O.P RATED FILTERS, NORDSON  A/N <del>369233</del> 488524	D69          C70			[PM]: RULE 404,2-7- 1986;RULE 405,2-7-1986 [VOC]: RULE 1107,11-9- 2001; <u>RULE 1107, 1-6- 2006</u> ,RULE 1171,11-7- 2003; <u>RULE 1171,5-6- 2005</u> , <u>RULE 1171, 2-1- 2008</u>	A63.2, B27.2, C1.3, <del>C6.6</del> , <u>C6.7</u> , <u>C6.8</u> , D322.1, D323.2, <del>E80.2</del> , <u>E175.3</u> , H23.1, K67.2

A/N 491099

Minor Title V/RECLAIM Permit Revision

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History:

Superior industries is a NO<sub>x</sub> RECLAIM and Title V facility. The application for the liquid spray booth D64 was submitted on October 7, 2008 for the replacement of filters and for change of permit conditions. The applications for the three powder spray booths D65, D67, and D69 were submitted September 23, 2008 for change of permit conditions.

Application No	Previous A/N, Permit No.	Device ID	Application Type
491097	369234, F37051	D64	Modification, change of permit condition
488521	369231, F37055	D65, C66	Change of permit conditions
488523	369232, F37056	D67, C68	Change of permit conditions
488524	369233, F37057	D69, C70	Change of permit conditions

The facility was issued a Title V renewal permit on 5/9/2005. This permit revision is the third revision to the Title V renewal permit.

Process Description:

The company manufactures automotive aluminum wheels sold to auto manufacturers worldwide. Operations include aluminum foundry, machining, and finishing.

In the finishing department, both liquid and powder coatings are applied manually using HVLP and electrostatic guns on the aluminum wheels in the above spray booths. The above spray booths were issued permits to operate on March 1, 2001. The booths are operated 24 hrs/day, 6 days/wk, 52 wks/yr. The application for the liquid spray booth was submitted as class I for modification of the equipment and for change of permit conditions. The applicant replaced the fifty four 2" thick filters with pre filters and filter bags. Since the applicant modified the permit without the benefit of a permit to construct, the above application is subject to additional fees (50%) for not having PC. The applications for the three powder spray booths were submitted for change of permit conditions. The following are the requested changes to the permit conditions:

Device ID	Condition No.	Current	Proposed
D64	E80.1	The operator shall not use this equipment when any of the following equipment are operating:  D10 & D11	Delete
D64	E175.1	The operator shall not use this equipment unless all exhaust air	The operator shall not use this equipment unless all exhaust air



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		passes through the following: filter media at least 2 inches thick.	passes through filter media with a minimum capture efficiency of 98%.
D64	B27.2	The operator shall not use materials containing any toxic air contaminants identified in SCAQMD Rule 1401, as amended 13-Aug-1999.	Same, but adding the following: "except ethylene glycol butyl ether (CAS 111-76-2) in a concentration not to exceed 15% by weight."
D65 D67 D69	C6.6	The operator shall use this equipment in such a manner that the differential pressure monitored, as indicated below, does not exceed 0.25 inches water column.	The operator shall use this equipment in such a manner that the differential pressure monitored, as indicated below, does not exceed 6.0 inches water column for the cartridge filter and 0.25 inches water column for the final filter.
D65 D69	E80.2	The operator shall not use this equipment when any of the following equipment are operating: D12, D15, and D47	Delete Condition
D67	E80.3	The operator shall not use this equipment when any of the following equipment are operating: D28 & D29	Delete Condition

#### Spray Booth D64:

The modification to the spray booth by the replacement of the exhaust filters is not expected to result in an emission increase. The applicant is not proposing any change to current permit condition A63.2 which limits the VOC emissions from all liquid and powder coatings from the facility to less than or equal to 262 pounds per day. Further, the modification will not result in any PM10 emission increase since the replacement of the single stage filter system with a two stage filtering system is expected to have an equivalent or better efficiency.

Condition E80.1 prohibits the operation of spray booth D64 whenever spray booths D10 and D11 are in operation. The existing E80.1 condition should be deleted since spray booths D10 and D11 have been removed from service, the permits have been inactivated and the equipment removed from Section D.

Condition E175.1 should be revised since the newly installed two stage filtering system is expected to perform equivalent or better than the previously permitted filters. Therefore, permit condition E175.1 should be revised to read:

*The operator shall not use this equipment unless all exhaust air passes through the following:*

*A two stage filtering system as specified in the equipment description.*

Toxic Emissions:



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Current condition B27.2 prohibits the applicant from using any materials containing toxic air contaminant identified in Rule 1401 in the spray booth. The applicant is proposing to revise condition B27.2 by allowing the use of EGBE, CAS 111-76-2, that may be found in liquid coatings used by the facility. The coatings used in the spray booth may contain up to 15 percent EGBE.

$SG_{\text{minimum}} = 1.03$ , minimum VOC = 1.3 lb/gal, sprayed inside the D64 spray booth

Based on the existing facility-wide ROG daily limit of 262 pounds per day, the following is a worst-case estimate of EGBE emissions:

$$\begin{aligned}\text{Maximum Usage of Coatings (gal/dy)} \\ &= (262 \text{ lb/dy}) / (1.3 \text{ lb/gal}) = 202 \text{ gal/dy}\end{aligned}$$

$$\begin{aligned}\text{EGB (lb/hr)} &= (202 \text{ gal/dy})(1.03)(8.345 \text{ lb/gal})(15\%) / (16) \text{ lb/hr} \\ &= 16.28 \text{ lb/hr} \\ &= (16.28)(16)(7)(52) / 2000 \text{ ton/yr} = 47.5 \text{ ton/yr}\end{aligned}$$

The attached Excel worksheet calculates MICRs, HIAs and HICs for both residential and off-site worker receptors following Tier II risk assessment procedure. The MICRs are not computed since EGBE does not have any cancer risk. The calculated HIAs and HICs are less than 1.0 for all target organs.

Therefore, permit condition B27.2 will be removed from device D64 and replaced with condition B59.9

*B59.9 The operator shall not use materials containing any toxic air contaminants identified in SCAQMD Rule 1401, Table 1 with an effective date of March 7, 2008 or earlier with the exception of ethylene glycol monobutyl ether (CAS 111-76-2) up to 15% by weight maximum.*

### Powder Booths D65, D67, and D69:

Current condition C6.6 limits the differential pressure across the exhaust filters to 0.25 inches water column. This condition is normally appropriate for conventional spray booth filters. However, the above spray booths are powder booths equipped with cartridge and box type filters. According the manufacturers data (Nordson Product Manual for Excel 2000 Series Powder Coating System), the pressure differential across the primary cartridge filters is in the range of 4 to 6 inches of water column. The applicant requested to change the limit for the cartridge filters to 6 inches water column. Therefore, permit condition C6.6 will be removed from the powder spray booths and replaced with C6.7 and C6.8.



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C6.7 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 0.25 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the final filter media.

C6.8 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 6 inches water column.

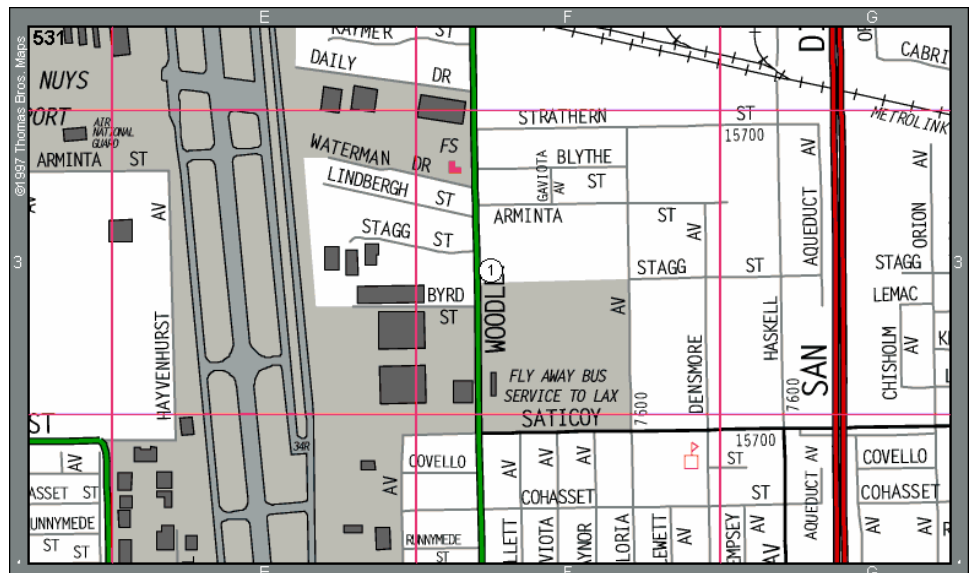
To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the cartridge filters.

Conditions Nos. E80.2 and E80.3 prohibits the operation of the powder spray booths whenever devices D12, D15, D28, D29, and D47 are in operation. This condition should be removed since D12, D15, D28, D29, and D47 have been removed from service, the permits have been inactivated and the equipment removed from Section D.

## Rule Evaluation

Rule 212(c)(1):

This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.





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Since no school is located within 1,000 ft from the above emission source, a public notice will not be required.

Rule 212(c)(2): This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).

	Controlled Emissions (lb/dy)					
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	SO <sub>2</sub>	CO	Pb
Increase from Facility	0	0	0	0	0	0
MAX Limit	30	40	30	60	220	3
Required Public Notice	No	No	No	No	No	No

The above table summarizes the emission limits and increases. Since emission increases are less than the limits, a public notice will not be required.

Rule 212(c)(3): There will be EGBE emission increases. However, EGBE does not have any cancer risk. Therefore, MICRs are expected to be 0, less than 1E-6. Thus, a public notice will not be required.

Rule 212(g): This section requires a public notice for all new or modified sources that have emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The following table summarizes the limit and Potential-to-Emit (PTE) emissions from the project:

	Controlled Emissions (lb/dy)					
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	SO <sub>2</sub>	CO	Pb
Increase from Project	0	0	0	0	0	0
MAX Limit	30	40	30	60	220	3
Required Public Notice	No	No	No	No	No	No

Thus, this section will not trigger a public notice requirement.

Rule 401: Visible emissions are not expected with the proper operation and maintenance of the equipment.



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Rule 402: Nuisance is not expected with the proper operation and maintenance of the equipment.

Rule 1401: The calculated HIAs and HICs from EGBE emission increases following Tier II risk assessment are less than 1.0 for all target organs. MICRs are not computed since EGBE does not have any cancer risk. Therefore, this project is expected to comply with Rule 1401.

Reg XIII: The proposed project will not result in any emission increases of criteria pollutants. Therefore, compliance with this regulation is expected.

Reg XXX: This facility is in the RECLAIM program. The proposed project is considered as a "minor permit revision" for RECLAIM pollutants, non-RECLAIM pollutants, and hazardous air pollutants (HAPs) to the RECLAIM/Title V permit for this facility. Rule 3000(b)(12) specifies that a "minor permit revision" includes, but is not limited to any Title V permit revision that:

Rule 3000(b)(12)(A)(v) - does not result in an emission increase of any RECLAIM pollutant over the facility's starting Allocation plus the non-tradeable Allocation, or higher Allocation amount which has previously undergone a significant permit revision process. This project does not result in any NOx emission increase.

Rule 3000(b)(12)(A)(vi) - does not result in an increase in emissions of a pollutant subject to Regulation XIII - New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP). This project does not result in any emission increase of pollutants subject to Regulation XIII. This project does result in emission increase of EGBE. However, EGBE, CAS 111-76-2 is not a pollutant on a list maintained by EPA pursuant to Section 112(b) of the federal Clean Air Act.

The proposed project is not expected to result in an emission increase of any RECLAIM pollutant or an increase in emissions of a pollutant subject to Regulation XIII - New Source Review (non-RECLAIM





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pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a "minor permit revision" pursuant to Rule 3000(b)(12)(A)(v) and Rule 3000(b)(12)(A)(vi).

This proposed project is the 3rd permit revision to the Title V renewal permit issued to this facility on May 9, 2005

### Recommendation

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a "minor permit revision", it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V/RECLAIM permit will be issued to this facility with the following proposed conditions:

### Conditions:

#### **A63.2**

The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 262 LBS IN ANY ONE DAY

For the purposes of this condition, the limit(s) shall be based on the total combined emissions from the use of (liquid and powder) coatings and solvents at this facility.

The operator shall calculate the emission limit(s) using one of the following emission factors whenever powder coatings are used: VOC content determined pursuant to AQMD Method 316C (or an equivalent EPA test method) or the default emission factor of 0.01 pound of VOC per pound of powder coating sprayed  
RULE 109, 5-2-2003; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002

[Devices subject to this condition: D64, D65, D67, D69]

#### **B27.2**

The operator shall not use materials containing any toxic air contaminants (TACs) identified in the SCAQMD Rule 1401, as amended 13-aug-1999.

RULE 1401, 8-13-1999

[Devices subject to this condition: D65, D67, D69]

#### **B59.9.**

The operator shall not use materials containing any toxic air contaminants identified in SCAQMD Rule 1401, Table 1 with an effective date of March 7, 2008 or earlier with the exception of ethylene glycol monobutyl ether (CAS 111-76-2) up to 15% by weight maximum.

RULE 1401, 3-7-2008

[Devices subject to this condition: D64]



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#### C1.3

The operator shall limit the material processed to no more than 1000 lbs in any one day.

For the purpose of this condition, material processed shall be defined as powder coating usage.

RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002  
[Devices subject to this condition: D65, D69]

#### C1.11

The operator shall limit the material processed to no more than 2000 lb(s) in any one day.

For the purpose of this condition, material processed shall be defined as powder coating usage.

RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002  
[Devices subject to this condition: D67]

#### C6.6

The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 0.25 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the filter media.

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002  
[Devices subject to this condition: D64]

#### C6.7

The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 0.25 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the final filter media.

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002  
[Devices subject to this condition: D65, D67, D69]

#### C6.8

The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 6 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the cartridge filters.

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002  
[Devices subject to this condition: D65, D67, D69]

#### D322.1

The operator shall perform a weekly inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997  
Devices subject to this condition: D64, D65, D67, D69]

#### D323.2

The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.



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If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
  - 2). Description of any corrective actions taken to abate visible emissions;
  - 3). Date and time visible emission was abated; and
  - 4). All visible emission observation records by operator or a certified smoke reader.
- RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997  
[Devices subject to this condition: D64, D65, D67, D69]

#### **E175.2**

The operator shall not use this equipment unless all exhaust air passes through the following:

A two stage filtering system as specified in the equipment description.

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002

[Devices subject to this condition: D64]

#### **E175.3**

The operator shall not use this equipment unless all exhaust air passes through the following:

A primary cartridge type filters and secondary box type filters as specified in the equipment description.

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002

[Devices subject to this condition: D65, D67, D69]

#### **E80.1**

~~The operator shall not use this equipment when any of the following equipment are operating:~~

~~Device ID: D10 [SPRAY COATING OPERATION]~~

~~Device ID: D11 [SPRAY COATING OPERATION]~~

~~RULE 1303(b)(2) Offset, 5-10-1996; RULE 1303(b)(2) Offset, 12-6-2002~~

#### **E80.2**

~~The operator shall not use this equipment when any of the following equipment are operating:~~

~~Device ID: D12 [SPRAY COATING OPERATION]~~

~~Device ID: D15 [SPRAY COATING OPERATION]~~

~~Device ID: D47 [SPRAY COATING OPERATION]~~

~~RULE 1303(b)(2) Offset, 5-10-1996; RULE 1303(b)(2) Offset, 12-6-2002~~



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### **E80.3**

~~The operator shall not use this equipment when any of the following equipment are operating:-~~

~~Device ID: D28~~

~~Device ID: D29~~

~~RULE 1303(b)(2) Offset, 5-10-1996; RULE 1303(b)(2) Offset, 12-6-2002~~

### **H23.1**

This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	109
PM	District Rule	481

RULE 109, 5-2-2003; RULE 481, 1-11-2002  
[Devices subject to this condition: D64, D65, D67, D69]

### **K67.2**

The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

the name of the person performing the inspection and/or maintenance of the filter media

the date, time and results of the inspection

weekly record of pressure drop across the filter media

the date, time and description of any maintenance or repairs resulting from the inspection

RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997

[Devices subject to this condition: D64, D65, D67, D69]